

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Plaintiff,

v.

B4B EARTH TEA LLC, a limited liability
company;

B4B CORP., a corporation; and

ANDREW MARTIN SINCLAIR, individually
and as an officer of B4B EARTH TEA LLC and
B4B CORP.,

Defendants.

**AFFIDAVIT OF TONY PEZZANO IN
SUPPORT OF MOTION FOR LEAVE
TO WITHDRAW AS COUNSEL FOR
DEFENDANTS**

Civil Action No.: 22-CV-1159

Tony V. Pezzano, being duly sworn, pursuant to 28 U.S.C. § 1746, does hereby depose and states under penalty of perjury that the following is true and correct:

1. I submit this affidavit in support of the motion made by Matthew Asbell (“Asbell”) and Tony Pezzano (“Pezzano”), attorneys at Offit Kurman, P.A. (“Offit”), for leave to withdraw as counsel for the Defendants.
2. I am an attorney licensed in New York and admitted to practice before the Eastern District of New York.
3. I entered an appearance in this matter as counsel for the Defendants B4B Earth Tea LLC, B4B Corp., and Andrew Martin Sinclair on September 12, 2022.
4. Since I am admitted in Eastern District of New York, I was requested by Asbell, who was not admitted at the time, to enter an initial appearance to request postponement of an initial Status Conference.
5. In my initial and only letter to this Court in relation to this matter, I pointed out that Defendants retained my firm for the purpose of settling this matter with Plaintiff, and I requested a postponement of a Status Conference that was scheduled for September 13, 2022.
6. My appearance and involvement in this matter was limited to the foregoing.
7. I have not participated in this matter substantively since my initial appearance, and I have had no direct communication with the Defendants.

Dated: December 20, 2022
New York, New York

/s/Tony V. Pezzano
Tony V. Pezzano
(TP2058)
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